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April 6, 2024

Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

VIA ECF

Re: United States v. Avraham Eisenberg
23 Cr. 10 (AS)

Dear Judge Subramanian:

As discussed during yesterday's conference, under cover of this letter, defendant Avraham Eisenberg respectfully submits the defense's request for an instruction regarding securities-based swaps in redline format against the Court's Draft [Proposed] Jury Charge 4.4.

Thank you for Your Honor's consideration of this letter.

Sincerely,

Noam Greenspan

Noam Greenspan
Sanford Talkin

– and –

Brian Klein
Ashley Martabano
Riley Smith
Waymaker LLP

Enclosure

cc: all counsel of record (by ECF)